



Jason A. Wheeler
314 552 6458 direct
jwheeler@thompsoncoburn.com

One US Bank Plaza
St. Louis, MO 63101

314 552 6000 main
314 552 7000 fax
thompsoncoburn.com

MEMO ENDORSED


HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE
DATED: January 23, 2024

January 19, 2024

VIA ECF

Hon. Valerie Figueredo
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1660
New York, New York 10007
FigueredoNYSDChambers@nysd.uscourts.gov

Re: **Wade Mullen v. Bodum USA, Inc.**, Case No. 1:23-cv-01166-AT-VF
Consent Motion to Adjourn January 24, 2024, Pre-Settlement Conference

Dear Judge Figueredo:

I was recently retained by Defendant Bodum USA, Inc. ("Bodum") to represent it in connection with the above lawsuit. A Notice of Substitution was filed on January 17, 2024 (ECF No. 33), but has yet to be entered by the Court.

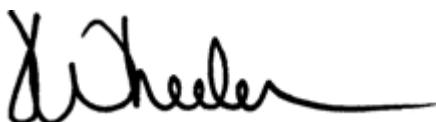
On December 14, 2023, Judge Torres entered an Order referring this case to your Honor for purposes of settlement (ECF No. 28). The parties were scheduled to appear on January 16, 2024, for a pre-settlement conference (ECF No. 29). Counsel for Bodum did not appear and the Court reset the conference for January 24, 2024 (ECF No. 32).

Regrettably, I am unavailable on January 24th due to a product inspection in an unrelated case in the State of California. We respectfully request that the Court adjourn the pre-settlement conference to a later date to allow undersigned counsel to appear. This is Bodum's first request for adjournment of the pre-settlement conference.

Plaintiff consents to this request.

Very truly yours,

Thompson Coburn LLP



By

Jason A. Wheeler

January 19, 2024

Page 2

cc: Alex Kress (akress@johnsonbecker.com)
Randi Kassan (rkassan@milberg.com)